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7 TIMOTHY DRAPER

8 UNITED STATES DISTRICT COURT
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION
11

12 ANDREW OKUSKO, individually and on
13 behalf of all others similarly situated,

14 Plaintiff,

15 vs.

16 DYNAMIC LEDGER SOLUTIONS, INC.,
17 THE TEZOS FOUNDATION, KATHLEEN
BREITMAN, ARTHUR BREITMAN,
18 TIMOTHY DRAPER,

19 Defendants.
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Case No. 3:17-cv-06829

**JOINT STIPULATION EXTENDING
TIME FOR TIMOTHY DRAPER TO
RESPOND TO COMPLAINT**

1 Defendant Timothy Draper (“Draper”) and plaintiff Andrew Okusko (“Okusko”)
 2 (collectively, the “Appearing Parties”) stipulate pursuant to Civil L. R. 6-1(a) to extend the time
 3 for Draper to respond to the putative class action complaint (“Complaint”), filed in the above-
 4 captioned action (the “Instant Action”), as follows:

5 WHEREAS, on November 28, 2017, Okusko filed the Complaint alleging violations of
 6 the Securities Act;

7 WHEREAS, Securities Act claims brought as class actions pursuant to the Federal Rules
 8 of Civil Procedure may be subject to the lead plaintiff provisions of the Private Securities
 9 Litigation Reform Act (“PSLRA”). See 15 U.S.C. § 77z-1;

10 WHEREAS, Okusko filed a proof of service stating that he served Draper with the
 11 Summons and Complaint in the Instant Action by substitute service on December 11, 2017;

12 WHEREAS, on December 14, 2017, Okusko, and defendant Dynamic Ledger Solutions,
 13 Inc. (“DLS”), and defendants Kathleen Breitman and Arthur Breitman (“Breitman Defendants”),
 14 agreed and stipulated that DLS and the Breitman Defendants shall not be required to move to
 15 dismiss or otherwise respond to the Complaint filed in the Instant Action until 30 days after the
 16 Court appoints a lead plaintiff and lead counsel, and lead plaintiff files and serves a consolidated
 17 complaint or a notice stating that lead plaintiff designates a previously filed complaint as
 18 operative;

19 WHEREAS, the Appearing Parties have met and conferred and agree that Draper should
 20 respond to the Complaint on the same schedule as DLS and the Breitman Defendants;

21 WHEREAS, these extensions will not alter the date of any event or any deadline already
 22 fixed by order of this Court; and

23 WHEREAS, Draper has not obtained any previous time modifications in this case.

24 NOW, THEREFORE, the Appearing Parties hereby stipulate as follows:

25 Draper may but shall not be required to move to dismiss or otherwise respond to the
 26 Complaint filed in the Instant Action until 30 days after the Court appoints a lead plaintiff and
 27 lead counsel, and lead plaintiff files and serves a consolidated complaint or a notice stating that
 28 lead plaintiff designates a previously filed complaint as operative. Pursuant to Civil L. R. 6-1(a),

1 this paragraph shall be effective upon the filing of this Stipulation with the Court.

2 **IT IS SO STIPULATED.**

3 Dated: December 29, 2017

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5 LEVI & KORSINSKY, LLP

MANATT, PHELPS & PHILLIPS, LLP

6
7 /s/ Rosemary M. Rivas
8 Rosemary M. Rivas
9 Attorneys for Plaintiff
10 ANDREW OKUSKO

/s/ Ana G. Guardado
Christopher L. Wanger
Ana G. Guardado
Attorneys for Defendant
TIMOTHY C. DRAPER

11 **FILER'S ATTESTATION**

12 Pursuant to Civil L. R. 5-1(i)(3), regarding signatures, Ana G. Guardado hereby attests
13 that concurrence in the filing of the document has been obtained from all of the signatories above.

14
15 Dated: December 29, 2017

MANATT, PHELPS & PHILLIPS, LLP

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17 /s/ Ana G. Guardado
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